

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF MISSISSIPPI  
SOUTHERN DIVISION**

<p><b>CHARLES WILLIAMS</b>, individually and on behalf of all others similarly situated,</p> <p style="text-align: right;">Plaintiff,</p> <p>v.</p> <p><b>BIENVILLE ORTHOPAEDIC SPECIALISTS LLC</b>,</p> <p style="text-align: right;">Defendant.</p>	<p>Case No. 1:23-cv-00232-LG-MTP</p> <p>Complaint filed September 12, 2023</p>
<p><b>ROBERT FENDLEY</b>, individually and on behalf of all others similarly situated,</p> <p style="text-align: right;">Plaintiff,</p> <p>v.</p> <p><b>BIENVILLE ORTHOPAEDIC SPECIALISTS LLC</b>,</p> <p style="text-align: right;">Defendant.</p>	<p>Case No. 1:23-cv-00234-LG-MTP</p> <p>Complaint filed September 15, 2023</p>
<p><b>GUY SCHENCK</b>, individually and on behalf of all others similarly situated,</p> <p style="text-align: right;">Plaintiff,</p> <p>v.</p> <p><b>BIENVILLE ORTHOPAEDIC SPECIALISTS LLC</b>,</p> <p style="text-align: right;">Defendant.</p>	<p>Case No. 1:23-cv-00237-HSO-RPM</p> <p>Complaint filed September 18, 2023</p>
<p><b>DEBBIE SLUSSER</b>, individually and on behalf of all others similarly situated,</p> <p style="text-align: right;">Plaintiff,</p> <p>v.</p>	<p>Case No. 1:23-cv-00238-HSO-RPM</p> <p>Complaint filed September 18, 2023</p>

<p><b>BIENVILLE ORTHOPAEDIC SPECIALISTS LLC,</b></p> <p>Defendant.</p>	
<p><b>BRADLEY MCCOY and NANCY MCCOY</b>, individually and on behalf of all others similarly situated,</p> <p>Plaintiffs,</p> <p>v.</p> <p><b>BIENVILLE ORTHOPAEDIC SPECIALISTS LLC,</b></p> <p>Defendant.</p>	<p>Case No. 1:23-cv-00243-LG-RPM</p> <p>Complaint filed September 18, 2023</p>
<p><b>ROBERT HARRIS</b>, individually and on behalf of all others similarly situated,</p> <p>Plaintiff,</p> <p>v.</p> <p><b>BIENVILLE ORTHOPAEDIC SPECIALISTS LLC,</b></p> <p>Defendant.</p>	<p>Case No. 1:23-cv-00248-HSO-BWR</p> <p>Complaint filed September 25, 2023</p>
<p><b>RICHARD ROSE</b>, individually and on behalf of all others similarly situated,</p> <p>Plaintiff,</p> <p>v.</p> <p><b>BIENVILLE ORTHOPAEDIC SPECIALISTS LLC,</b></p> <p>Defendant.</p>	<p>Case No. 1:23-cv-00253-LG-MTP</p> <p>Complaint filed September 28, 2023</p>

**PLAINTIFFS' MOTION TO CONSOLIDATE AND APPOINT EXECUTIVE  
LEADERSHIP COMMITTEE PURSUANT TO FRCP 23(G)**

Under Federal Rules of Civil Procedure 42(a) and 23(g)(3) and L.R. 42, Plaintiffs Charles Williams, Robert Fendley, Guy Schenck, Debbie Slusser, Bradley and Nancy McCoy, Robert Harris, and Richard Rose (collectively, “Plaintiffs”), by and through their undersigned counsel, respectfully move this Honorable Court for the consolidation of *Williams v. Bienville Orthopaedic Specialists, LLC*, Case No. 1:23-cv-00232-LG-MTP (filed September 12, 2023); *Fendley v. Bienville Orthopaedic Specialists, LLC*, Case No. 1:23-cv-00234-LG-MTP (filed September 15, 2023); *Schenck v. Bienville Orthopaedic Specialists, LLC*, Case No. 1:23-cv-00237-HSO-RPM (filed September 18, 2023); *Slusser v. Bienville Orthopaedic Specialists, LLC*, Case No. 1:23-cv-00238-HSO-RPM (filed September 18, 2023); *McCoy v. Bienville Orthopaedic Specialists, LLC*, Case No. 1:23-cv-00243-LG-RPM (filed September 22, 2023); *Harris v. Bienville Orthopaedic Specialists, LLC*, Case No. 1:23-cv-00248-HSO-BWR (filed September 25, 2023), and *Rose v. Bienville Orthopaedic Specialists, LLC*, Case No. 1:23-cv-00253-LG-MTP (filed September 28, 2023) (collectively, the “Related Actions”).<sup>1</sup>

Plaintiffs also move for an order appointing an interim Executive Leadership Committee as interim class counsel on behalf of Plaintiffs and the putative Class of: Raina C. Borrelli of Turke & Strauss LLP (to serve as Chair of the Executive Committee), Daniel Srourian of Srourian Law Firm, P.C., Danielle Perry of Mason LLP, Gary M. Klinger of Milberg Coleman Bryson Phillips Grossman, and Brooke Murphy of the Murphy Law Firm, and appointing J. Matthew Eichelberger of Eichelberger Law Firm, PLLC, as liaison counsel (together, the “Proposed Leadership Committee”). As explained in Plaintiffs’ memorandum, the appointment of the Proposed Leadership Committee will provide the counsel “best able to represent the interests of the class.” *See* Fed. R. Civ. P. 23(g)(2).

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<sup>1</sup> Counsel for Defendant has not yet appeared in this case, and thus Plaintiffs were unable to confer to obtain Defendant’s position on the relief requested.

Dated: September 29, 2023

Respectfully Submitted,

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**CERTIFICATE OF SERVICE**

I, Raina C. Borrelli, hereby certify that on September 29, 2023, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to counsel of record via the ECF system.

DATED this 29th day of September, 2023.

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